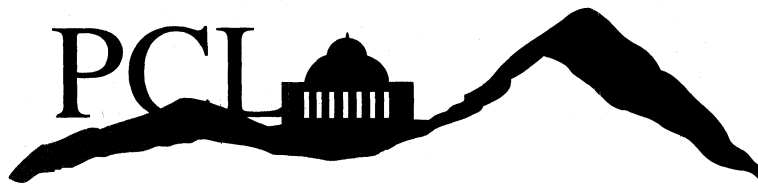


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To: Paul Dabbs
Statewide Planning Branch
California Department of Water Resources
P.O. Box 942836
Sacramento, Ca 94236-001

Cc: Lester Snow
Michael Chrisman
Senator Michael Machado
Assemblyman Joe Canciamilla

From: Mindy McIntyre, Water Policy Specialist for the Planning & Conservation League

Subject: Comments on the June 7, 2004 Advisory Committee
Review Draft Volume 1

Date: June 24, 2004

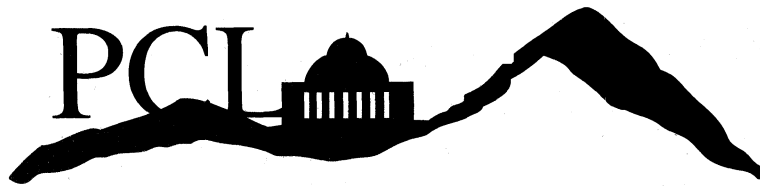
The stated purpose of the California Water Plan Update is to:
"provide decision-makers, resource managers, water suppliers, and all water users a strategic water plan for the next quarter century with specific goals, objectives, findings, and a robust set of recommended actions."

However, the most recent draft of the California Water Plan Update noticeably lacks a key component needed to develop a strategic plan: priorities for investment. The draft simply lists twenty-five 'strategy investment options' of which water managers are supposed to pick and chose. However, without clear investment priorities, the best management and most cost-effective 'options' are lost in the mix of drastically inefficient options. Investment priorities should be provided as the basis for choosing the most effective 'strategy investment options,' and to provide the guidance needed for local and state leaders to develop effective strategic water management plans.

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Also lacking in the draft is a discussion of the current fiscal setting of the state. While in the past California has received and approved massive State and Federal subsidies for water management, recent appropriations have demonstrated that these massive subsidies are no longer available. For instance, Federal appropriations for Calfed were only \$30 million: \$850 million less than expected. With California facing a record budget shortfall, general fund spending for new water projects cannot be expected to increase in the near future. It is clear that California must now maximize what funds do exist for water management. As funding will decide which programs and projects will be feasible in any water management strategy, a discussion of the current fiscal climate needs to be included in the settings section of Chapter 1.

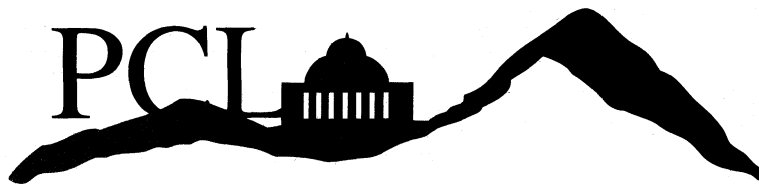
The California Water Plan Update should be realistic and forthcoming as to which investment options are viable in today's fiscal climate. Investment priorities that will maximize water benefits for dollars spent should be clearly identified.

In order to serve the stated purpose of the California Water Plan Update, the plan should include clear investment principles that are feasible under the current settings, focused on cost-effectively meeting water needs, protecting and ensuring water quality, decreasing risk, minimizing costs, and maintaining the quality of life and the environment of California. Investment priorities that should be identified in the plan are as follows:

- Invest in and pursue increased agriculture conservation
- Invest in statewide and local urban water conservation and recycling programs
- Invest in groundwater storage
- Invest in groundwater desalination
- Invest in watershed management
- Decrease dependence on the Delta
- Invest in strategies that allow California to adapt to global climate change
- Minimize risk of significant losses during flood events
- Ensure adequate water supplies are available before approving new development

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- Invest in programs that prevent groundwater pollution and maintain groundwater quality
- Invest in programs that minimize or eliminate pollution of surface waters
- Invest in water quality monitoring, assessment, and research
- Implement the beneficiary pays principle
- Implement the polluter pays principle
- Invest in water projects that serve smart growth
- Protect California's agriculture and rural communities
- Ensure all Californians can participate in water management planning
- Invest in and support the restoration of California's environment
- Invest in the restoration of California's rivers and freshwater ecosystems to a sustainable and attractive status
- Invest in the removal of barriers to fish passage throughout the state
- Provide adequate water for the Bay Delta to insure its health and sustainability

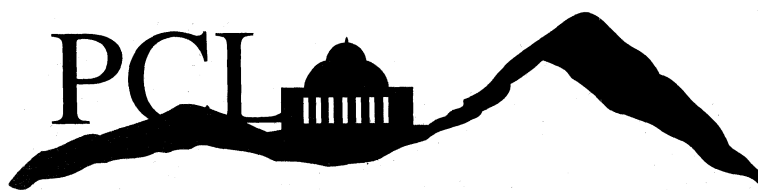
The above priorities are consistent with the stated mission, key themes, goals and objectives of the California Water Plan Update.

Priorities, such as the ones above should be utilized to link investment options to the stated objectives of the plan. As the draft currently stands, there is no clear indication of which investment option should be chosen to achieve a specific objective. The draft simply states that the water management objectives and the strategy investment options relate to several of the goals and objectives of the water plan (Chapter 1 Plan Overview, page 12, paragraph 1). This language is vague and gives little guidance as to which options will provide the maximum benefit for water management. A recommended investment priority column should be added to the Goals, Objectives and Related Recommended Actions on page 11 of Chapter 1 in order to clearly link objectives and management strategy options.

Without identifying investment priorities, this plan does not serve its intended purpose. The plan needs to clearly identify those options that are strategically superior in terms of costs and benefits provided

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PLANNING AND CONSERVATION LEAGUE

in order to advance intelligent planning and water management in California.

Sincerely,

Mindy McIntyre, Water Policy Specialist
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